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October 30, 2006

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: CC Docket 94-102  
E911 Handset Penetration Quarterly Report  
Northeast Communications of Wisconsin d/b/a Cellcom


Dear Ms. Dortch:

On behalf of Northeast Communications of Wisconsin d/b/a Cellcom ("Cellcom"), there is submitted herewith a report of the status of the carrier's progress in achieving 95% system wide penetration of location-capable handsets.

Cellcom is a Tier III that provides wireless service in parts of rural Wisconsin and Michigan. This report is submitted in compliance with the terms of the *Order*, CC Docket No. 94-102, FCC 05-200, released December 9, 2005, conditionally granting Cellcom an extension through December 9, 2006, of the deadline for compliance with Section 20.18(g)(1)(v) of FCC rules, 47 C.F.R. § 20.18(g)(1)(v).

Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,

  
Todd Slamowitz

Enclosure

**NORTHEAST COMMUNICATIONS OF WISCONSIN, INC  
D/B/A CELLCOM**

**E911 REPORT**

**NOVEMBER 1, 2006**

**1. The number and status of Phase II requests from Public Safety Answering Points**

- Number of counties in which Cellcom provides service = 23
  - Number of counties that have not requested Phase II = 3
  - Number of requests received = 19
    - Number of requests considered invalid = 0
    - Number of counties where Cellcom has implemented Phase II = 15
    - Number of counties with implementation date scheduled = 5

**2. The dates on which Phase II service has been implemented or will be available to PSAPs served by Cellcom's wireless network**

- Cellcom has already implemented Phase II service in the following eleven counties: Brown, Calumet, Door, Lincoln, Manitowoc, Marathon, Oconto, Outagamie, Portage, Shawano and Winnebago (in the state of Wisconsin); and Delta, Dickinson, Houghton, and Marquette (in the state of Michigan).
- Cellcom is scheduled to provide Phase II service to the following counties – Kewaunee (April 1, 2007), Marinette (???), Waupaca (March 1, 2007), Waushara (April 1, 2007), and Sheboygan (April 20, 2007). **NOTE:** *Marinette County* - Cellcom is currently ready to turn Phase II service on in Marinette County. The reason for the delay is that the PSAP is not ready to receive and utilize Phase II data. Marinette County has repeatedly delayed the implementation date and cannot provide a firm date for implementation. Once they set a date, we will adjust this answer accordingly.
- Counties that have not requested Phase II service from Cellcom: Fond du Lac, Iron, and Menominee (all in the state of Wisconsin). Please note that Iron and Menominee have indicated they have no intention of implementing Phase II E911 service at this time.
- Cellcom is prepared to implement Phase II service within six months of receipt of a valid request from **any** county that is served by Cellcom's network. Since the county determines that date, it is impossible for Cellcom to know the estimated date for which Phase II service will be available for a specific county where Cellcom has yet to receive a request.
- The counties included an estimated date as to when they would be ready for Phase II service in their E911 grant applications to the state of Wisconsin.

A table showing these estimated dates was attached to our initial report. The PSAPs are not updating this table, so Cellcom will not be including this table in each filing. If there is a need to see this table, we would refer you to the table that was included with our February 1, 2006 quarterly report.

3. **The status of coordination efforts with PSAPs for alternative 95% handset penetration dates**

- Cellcom continues to coordinate its E911 efforts with local PSAPs. Cellcom provides this quarterly report to each of the 20 PSAPs served by Cellcom who have implemented, or will be implementing, Phase II E911. Please note that two counties – Iron and Menominee – have indicated they have no plans to implement Phase II E911. Therefore, they are not receiving our quarterly reports. In addition, Cellcom responds in a timely manner to any inquiries we receive from PSAPs and to any PSAP requests for Phase II service.

4. **Efforts to encourage customers to upgrade to location-capable handsets**

- Cellcom continues to offer various aggressive incentive programs to its subscribers, including those subscribers that still use non-compliant handsets. In the past quarter, Cellcom began a direct-mail campaign specifically targeted at non-compliant customers. While this campaign is still ongoing, to date the take rate has been 10.4%. In addition, Cellcom began a campaign involving calling non-compliant customers with an upgrade offer. Like the direct mail campaign, this one is still ongoing and has been very successful. Currently the take rate is at 12.1% for this specific campaign.

5. **The extent of subscribers located in areas with analog service**

- Cellcom currently has no subscribers located in areas with analog service only. All cell sites in its network – except one – have digital capabilities. However, there are subscribers, especially those who use analog 3-watt bag phones, who receive a stronger, clearer analog signal despite the availability of a digital signal.

6. **The percentage of customers with location-capable phones**

- As of October 30, 2006, Cellcom is at 94.5% penetration.

7. **Status in achieving compliance and whether Cellcom is on schedule to meet its revised 12/09/06 deadline**

- Due to the aggressive efforts that have been undertaken, Cellcom believes it will reach 95% penetration by December 9, 2006.